

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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LAYLA KIANI, )  
Plaintiff, )  
vs. ) CIVIL ACTION NO. 04-CV-11838-PBS  
TRUSTEES OF BOSTON UNIVERSITY, )  
Defendant. )  
\_\_\_\_\_  
)

**DEFENDANT TRUSTEES OF BOSTON UNIVERSITY'S  
MOTION FOR A PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c), Defendant Trustees of Boston University (the "University") moves this Court to enter a protective order barring Plaintiff from taking any further discovery in this case. As grounds for this motion, the University states that several days after the close of discovery, Plaintiff served the University with two deposition notices that are not "reasonably calculated to lead to the discovery of admissible evidence" as required by Fed. R. Civ. P. 26(b)(1).

The University further opposes Plaintiff's motion to extend the discovery deadline in this case. A memorandum setting forth in detail the University's basis for this motion is attached.

Respectfully submitted,

TRUSTEES OF BOSTON UNIVERSITY,  
By its attorney,

s/Lawrence S. Elswit \_\_\_\_\_

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Date: May \_\_\_, 2005